UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK		
	X	
UNITED STATES OF AMERICA	:	
	:	14 Cr. 105 (MKB)
v.	:	NOTICE OF MOTION
	:	
JORGE ESTRADA-TEPAL, et al.	:	
	X	

PLEASE TAKE NOTICE, that the defendant, Ricardo Estrada-Tepal, shall move before the Honorable Margo K. Brodie, United States District Court Judge for the Eastern District of New York, at the United States District Courthouse, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be set by the Court, for an order:

- a) Granting Ricardo Estrada-Tepal's motion to suppress;
- b) Suppressing all fruits of the illegal search of Mr. Estrada-Tepal's residence;
- c) Suppressing all post-arrest statements made by Mr. Estrada-Tepal in the absence of a valid waiver of his *Miranda* rights;
- d) Permitting the defendant to join any motions made by his co-defendants to the extent that they are applicable to him, and;

Any other and further relief as this Court deems just and proper.

Dated: New York, New York

June 24, 2014

By: \_\_\_\_s/\_ Matthew B. Keller Of Counsel Peter R. Ginsberg Law LLC 80 Pine Street, 33rd Floor New York, N.Y. 10005 (646) 374 – 0026 mkeller@prglaw.com

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